

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EUFEMIA GUILLEN,

Plaintiff,

vs.

B.J.C.R. L.L.C., a Nevada Limited Liability
Company; B.J.H.S., LLC., a Nevada Limited
Liability Company; R.C.S.J., LLC, a Nevada
Limited Liability Company; Dhilan One L.L.C., a
Nevada Limited Liability Company; CHAMPAK
LAL, an Individual; and BHARAT B. LAL, an
Individual,

Defendants.

Case No.: 3:20-cv-00317-ART-CSD

ORDER APPROVING

**STIPULATION TO EXTEND TIME
FOR PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT (ECF No.
81) AND FOR DEFENDANTS'
REPLY**

(FIRST REQUEST)

Pursuant to LR IA 6-1 and LR 26-3, Defendants and Plaintiff Eufemia Guillen ("Plaintiff"), by and through their undersigned counsel, hereby stipulate to extend time for Plaintiff to Respond to Defendants' Motion for Summary Judgment (ECF No. 81) from the current deadline of April 7, 2023 through and including **April 21, 2023**. Additionally, the Defendants will have an extension to

May 12, 2023 to file their Reply. This is the first request for an extension of this specific deadline. The requested extension is sought in good faith and not for purposes of undue delay. The reasons for the extension are as follows:

1. Plaintiff's counsel, JAMES P. KEMP, ESQ., has been out of the country on a long-planned family commitment from March 22, 2023 through April 10, 2023.
2. Plaintiff's counsel, BARBARA W. GALLAGHER, ESQ., has been preparing for a trial in Reno scheduled for April 3, 2023.
3. As result of the above scheduling conflicts Plaintiff's counsel has not had time to address the summary judgment motion or to meet with Ms. Guillen to get her input in preparing the summary judgment response and will not be able to until after at least April 10, 2023.
4. Due to workload management needs associated with the Plaintiff's extension to April 21, 2023 to file a Response, the Defendants will have until May 12, 2023 to file a Reply.

Accordingly, additional time is needed and the parties request that the court grant this extension.
IT IS SO STIPULATED.

Dated this 31st day of March 2023.

KEMP & KEMP

/s/ James P. Kemp
James P. Kemp, Esq.

Attorney for Plaintiff

Dated this 31st day of March 2023.

SIMONS HALL JOHNSTON PC

/s/Sandra C. Ketner
Anthony L. Hall, Esq.
Sandra C. Ketner, Esq.

Attorneys for Defendants

ORDER

IT IS SO ORDERED



ANNE R. TRAUM
UNITED STATES DISTRICT JUDGE

Dated: April 3, 2023